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STACEY C. STONE
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November 16, 2016

VIA EMAIL AND U.S. MAIL

Office of Complaints Examination and Legal Administration
Attn: Mary Beth de Beau, Paralegal
Federal Election Commission
999 E Street, NW
Washington DC 20463
Email: CELA@fec.gov

Re: MUR 7164
Our File No. 1101-29352

Dear Sir or Madam:

We represent the Alaska Republican Party, Chairman Tuckerman Babcock and Treasurer Julie Tisdale (hereinafter collectively referred to as "Respondents") in connection with the above-referenced matter. The complaint alleges the Respondents mislead the public in three ways: 1) failing to properly disclose the party filing the financial reports; 2) failing to include the proper disclaimer on election materials; and 3) failing to properly disclose financial income and expenditures.

The complaint is completely without foundation and the commission should determine the complaint does not set forth any possible violation of the Federal Election Campaign Act of 1971 as amended and close the file.

The first allegation pertains to the transfer of leadership within the Alaska Republican Party following its biennial convention. Pursuant to 52 USC § 30103(c) provides that, "any change in information previously submitted in a statement of organization shall be reported... no later than 10 days after the date of the change." The Complainant alleges that the change in treasurer should have occurred within 10 days of the close of the biennial convention where the election of officers took place. However, it was not until such minutes were approved by the Alaska Republican Party State Central Committee and such minutes were provided to the bank for change of authorization that such any change took place. Pursuant to 52 USC § 30102(i), "best efforts have been used to obtain, maintain, and submit information required by th[e] Act."¹

¹ See, Affidavit of Treasurer Julie Tisdale which demonstrates that all reports are up to date and were corrected prior to the date of acceptance of the subject Complaint.

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The second allegation pertains to disclaimers on various publications. 52 USC § 30120(a) requires disclaimers identifying the funding and authorizing sources on certain political publications. Respondents maintain that the funding and source of the communication was clear, the Alaska Republican Party, and while the Party does not currently maintain a physical address, the current Party address was used in the communication.

The final allegation pertains to failure to properly disclose income and/or expenditures. This allegation is wholly baseless. The complainant has utilized a financial report that did not have all the information that was required to be reported under the Act. Thus, while the QuickBooks printout for the meeting utilized was dated May 31, 2016, the information contained in the FEC report was not indeed originally filed until June 21, 2016 after all matters were reviewed to ensure all income and/or expenditures were properly reported. Indeed, the "June Monthly" report was not fully complete until the final amendment on August 20, 2016.

In summary Respondents have made their best efforts to obtain, maintain and submit information required by the Act. The complaint does not provide any evidence that any egregious error has occurred or that the public was in any fashion misled. The complaint is without merit and the matter should be closed.

Sincerely,



for

Stacey C. Stone

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5) As the Treasurer, along with other executive staff and employees, I have put forth my best effort to obtain, maintain and submit information to the FEC as required by law.

Dated this 16 day of November, 2016



Julie Tisdale

SUBSCRIBED AND SWORN TO before me this 16th day of November, 2016 at Anchorage, Alaska.





Notary Public in and for the State of Alaska
My Commission Expires: November 19, 2019

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